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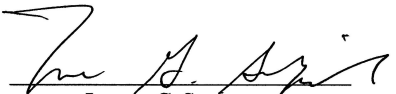
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Application **GRANTED**. By **September 16, 2022**, Defendant shall file an answer or otherwise respond to the Complaint. The initial pretrial conference scheduled for August 31, 2022 is **adjourned to September 28, 2022, at 4:30 p.m.**, on the following conference line: 888-363-4749, access code: 558-3333. By **September 21, 2022**, the parties shall file a joint letter and proposed case management plan pursuant to the Court's Order dated June 24, 2022. The Clerk of Court is respectfully directed to close the motion at Docket No. 10.

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Dated: August 17, 2022  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: *Quezada v. Don Sebastiani & Sons International Wine Negotiants*, 22-cv-4530-LGS  
**Consent Motion to Extend Time to Respond and to Adjourn Initial Pretrial Conference.**

Dear Judge Schofield:

We represent Defendant Don Sebastiani & Sons International Wine Negotiants ("Defendant") in the above captioned matter. We respectfully submit this letter to request an extension of Defendant's time to answer, move, or otherwise reply to the Complaint in accordance with the Court's Individual Practices. William Downes, counsel for Plaintiff Jose Quezada, has consented to this request.

On July 22, 2022, Defendant filed a letter motion seeking an extension of the time to answer, move, or otherwise reply to the Complaint in this matter. *See* Dkt. 8. Per the Court's July 25, 2022 order granting Defendant's request for an extension, Defendant's deadline to respond to the Complaint is presently August 17, 2022. *See* Dkt. 9. Since that time, the Parties have been engaged in good faith discussions to resolve this dispute. In furtherance of their efforts, on August 15, 2022, Defendant requested a 30-day extension of time to respond to the Complaint until September 16, 2022. Mr. Downes consented to Defendant's request that same day.

An Initial Pretrial Conference in this matter is scheduled for August 31, 2022. *See* Dkt. 9. Defendant therefore requests that the Court adjourn the presently scheduled Initial Pretrial Conference to a date after Defendant's new deadline to respond so that the parties may continue their efforts to consensually resolve this matter.

This is the second request for an extension of the deadline to respond to the complaint in this case and the second request to adjourn the Initial Pretrial Conference. The Parties will continue their discussions throughout this period, and agree that the requested extension will promote judicial efficiency and facilitate their good faith efforts to resolve this matter without further burdening this Court's time and resources.

Defendant therefore requests, and Plaintiff consents, that this Court grant Defendant an extension of thirty (30) days to respond to the Complaint to **September 16, 2022** and adjourn the presently scheduled Initial Pretrial Conference to after that date.

Respectfully submitted,

/s/ Joseph M. Sanderson

Joseph M. Sanderson

cc: All counsel of record, via ECF